

Exhibit C-Re CEASE DESIST Unauthorized Use of Melvin Moores Contributions and Composition

From: tiffany hblaw1.com [REDACTED]  
Subject: Fw: [CEASE & DESIST] - Unauthorized Use of Melvin Moore's Contributions and Composition(s)  
Date: [REDACTED]  
To: Tyrone Blackburn [REDACTED]

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• [REDACTED]

*Respectfully reserving rights as a matter of formality.*

Kind regards,  
Tiffany

**Tiffany Morgan, Esq.**

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**From:** tiffany [REDACTED]  
**Sent:** Monday, January 6, 2025 4:17 PM  
**To:** damien.smith@[REDACTED]  
ron.perry@[REDACTED]  
**Cc:** yns@[REDACTED] Amina McClain  
[REDACTED] Rappaport, Kim, Columbia Records  
[REDACTED]; bongodidi [REDACTED]  
mzulu@[REDACTED] samantha.dunac [REDACTED]  
[REDACTED] Tiffany Red [REDACTED]  
Truemusicmatters@[REDACTED]  
**Subject:** [CEASE & DESIST] - Unauthorized Use of Melvin Moore's Contributions and Composition(s)

Good Afternoon,

Please be advised that I represent **Melvin Moore p/k/a "OneInThe4Rest"**. As

you are undoubtedly aware, his contributions (underlying composition / lyrics / melodies) amongst other components, were used in the compositions outlined in the attached notice without his consent. Our client's position is outlined more fully in the attached.

*Respectfully reserving rights as a matter of formality.*

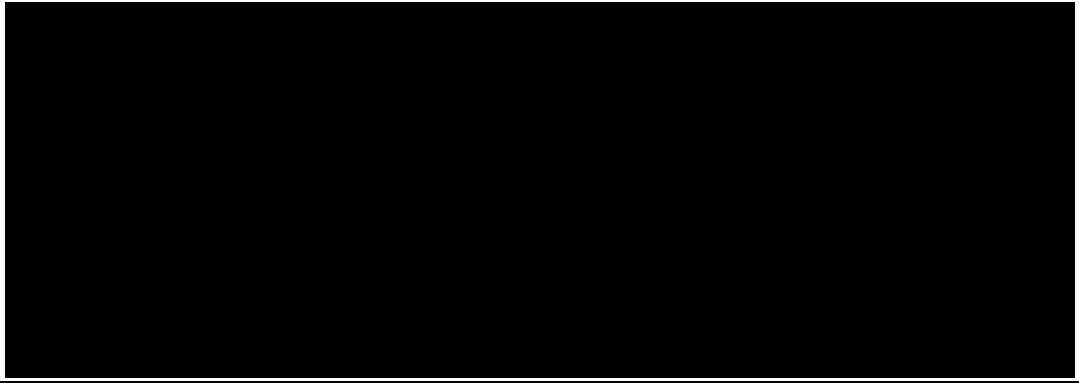
Kind regards,  
Tiffany

**Tiffany Morgan, Esq.**

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**DMCA - Takedown Notice [Sony]  
[Parkwood][X[X].pdf**  
247 KB





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[REDACTED] [REDACTED] Tiffany Morgan, Esq.

January 6, 2025

**Via Email & Certified Mail**  
**Parkwood Entertainment**

[REDACTED]  
[REDACTED]  
[REDACTED]

**Attn:** Business & Legal Affairs

**Sony Music**

[REDACTED]  
[REDACTED]  
[REDACTED]

**Attn:** Business & Legal Affairs

**Re: “Favorite”, “Same Lingerie”, and “Might as Well” by Chloe Bailey – Unauthorized Use of Melvin Moore’s Contributions and Composition (s) / Cease & Desist**

Please be advised that I represent the producer and songwriter **Melvin Moore** professionally known as **“OneInThe4Rest” (“4Rest”)**, who rendered production, recording, writing, and editing services contained on the master recordings (the “Master(s)”) embodying the musical compositions entitled: **“Favorite”, “Same Lingerie”, and “Might As Well”** (the “Composition(s)”) which include the performance of the recording artist professionally known as **“Chloe Bailey” (“Artist”)**. The Master(s) and the Composition(s) are collectively referred to herein as the “Work” and the Work is currently being exploited on Artist's album entitled **“Trouble in Paradise” (the “Album”)** which was released by **Sony Music / Parkwood Entertainment (collectively “Company”)** on or about **August 9, 2024**.

As you are well aware, Company's exploitation of the Work is unauthorized and is in violation of my client's rights. 4Rest will not be granting any rights to Company or Artist in and to the Work, and for the avoidance of doubt, will not be granting a first-use mechanical license in connection with the Work. Despite Company's implied acknowledgment that it proceeded without obtaining the necessary clearances from my client (a fact that cannot be disputed since there is no contributor, writer, or any other similar

agreement executed by my client in place), the Work is still commercially available as of the date of this letter.

Due to the foregoing, my client is hereby formally placing Company on notice that Company's reproduction, distribution and/or other commercial exploitation of the Work, on the Album or otherwise (collectively, the "Unauthorized Uses"), is in violation of 4Rest's copyrights therein and shall constitute infringement thereof. **Due to Company's knowing, intentional and continuous violation of our client's rights, we hereby demand that Company immediately make payment of Ten Thousand Dollars (\$10,000) to 4Rest as well as immediately cease from any and all further Unauthorized Uses until an agreement outlining the agreed to terms for his services has been executed by my client (such terms to include a royalty allocation of 2% per Master and a publishing allocation that aligns with the degree of my client's contributions made to the Work).** The Work must be removed immediately from all digital music service providers ("DSPs") (e.g. SoundCloud, Youtube, Spotify, iTunes, Google Play, etc); and websites, blogs, social media platforms, and anywhere else the Work is available.

No doubt you are aware that the commercial use of a third party's recording and composition requires permission from the owner and that the grant by the owner in and to a recording and composition generates significant fees and derives significant income for that rights holder. Company's callous and intentional disregard of my client's rights and Company's use of the Work without authorization is a willful infringement of his copyrights and is in violation of applicable federal and state laws.

You are hereby instructed to immediately cease and desist your unlawful efforts to distribute and exploit the Work (including, without limitation, selling, streaming or transmitting the Work), to cause all unauthorized sites, manufacturers, retailers and DSPs to do the same and to provide us with the following, in writing within **twenty-four (24) hours** from the date hereof to the attention of Tiffany Morgan, Esq. / [REDACTED]: (i) confirmation that you agree to immediately refrain from streaming, distributing and exploiting the Work in any manner; (ii) communication in writing to all service providers disavowing and withdrawing all past and future claims to monies due to you in association with your unauthorized exploitation; and (iii) complete an accurate statement of information and/or accounting regarding the extent and scope and nature of the use of the Work, including any and all sales data until such time the foregoing is resolved; and (iv) withhold any and all monies that may be due to third parties and refrain from making any other disbursements in connection with the Work.

Please be advised that in the event that Company fails to comply with any of 4rest's demands outlined herein, he shall have to take whatever legal action he deems necessary and appropriate to protect his rights in and to the Work, including, without limitation, commencing legal action against Company and all parties involved in the unauthorized use of the Work, seeking injunctive relief and/or statutory and punitive damages with respect to any and all acts of copyright infringement. Such damages could also include any and all profits that Company has derived or will derive from the Unauthorized Use of the Work.

The above is not intended to constitute a full recitation of the facts, circumstances, rights and or claims relating to this matter, nor is it intended to constitute, nor should it be construed as a waiver, release or relinquishment of any rights or remedies which may be available to my client, whether legal or equitable, all of which are hereby expressly reserved. Please guide yourself accordingly.

Sincerely,




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Tiffany Morgan, Esq.